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11 [Additional Counsel on Signature Page.]

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 ERIC WHITE, Individually and on
15 Behalf of All Others Similarly
16 Situated,

17 Plaintiff,

18 v.

19 BROOGE ENERGY LIMITED, et al.,

20 Defendants.
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Case No.: 2:24-cv-00959-AH-DFM

**NOTICE OF VOLUNTARY
DISMISSAL OF CLAIMS
AGAINST DEFENDANTS NEIL
RICHARDSON AND STEPHEN N.
CANNON PURSUANT TO RULE
41(a)(1)(A)(i)**

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff Bluefin Capital Management, LLC (“Plaintiff”) hereby dismisses its claims in the above-captioned action, without prejudice, against Defendants Neil Richardson and Stephen N. Cannon.

Rule 41(a)(1)(A)(i) allows a plaintiff to voluntarily “dismiss some or all of the defendants, or some or all of his claims, through a Rule 41(a)(1) notice.” *Wilson v. City of San Jose*, 111 F.3d 688, 692 (9th Cir. 1997). The Rule gives Plaintiff the “absolute right to voluntarily dismiss his action prior to service by the defendant of an answer or a motion for summary judgment.” *Id.*

To date, no Defendant in this action has served an answer or motion for summary judgment in response to any complaint. Plaintiff’s notice therefore “automatically terminates the action as to the defendants who are the subjects of the notice” – here, Defendants Richardson and Cannon. *See Wilson*, 111 F.3d at 692.

DATED: April 3, 2025

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ Amanda F. Lawrence

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19 *Attorneys for Lead Plaintiff Bluefin Capital*
20 *Management, LLC and Co-Lead Counsel*

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of this filing via electronic means to all counsel of record.

DATED: April 3, 2025

/s/ Amanda F. Lawrence
Amanda F. Lawrence (admitted *pro hac vice*)